

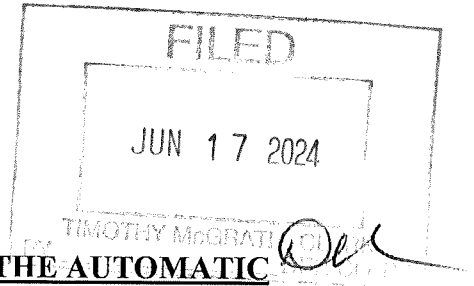
UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

CASE NO. 24-11344-BKC-AMC

CHAPTER 13 PROCEEDING

In re: Linda Theresa Giaccio  
aka Linda Giaccio  
SS #4046,

Debtor.



**DEBTOR'S PRO-SE MOTION FOR ORDER EXTENDING THE AUTOMATIC**  
**STAY BEYOND THE THIRTY (30) DAY PERIOD, PURSUANT TO**  
**11 U.S.C. SECTION 362(c)(3)(B)&(C)**

COMES NOW, Linda Theresa Giaccio aka Linda Giaccio, Chapter 13 Debtor ("Debtor"), and hereby files this my Pro Se Motion For Order Extending The Automatic Stay Beyond The Thirty (30) Day Period, Pursuant to 11 U.S.C. Section 362(c)(3)(B)&(C) of the United States Bankruptcy Code, and in support thereof states that:

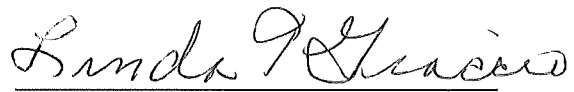
1. That I had a prior Chapter 13 case (Case #23-12090-BKC-SMG), having been filed on March 17, 2022, and subsequently dismissed, pursuant to court Order dated April 12, 2024, and thus within the one (1) year period, as outlined in 11 U.S.C. Section 362(c)(3).
2. Thus, I am seeking to extend the automatic stay beyond the thirty (30) day period, and that said Motion must be filed, and heard, and an order entered within the thirty (30) day period.
3. Furthermore, that I proffer and seek to rebut by clear and convincing evidence that the instant and subsequent Chapter 13 bankruptcy filing is presumably filed in good faith, and not in fact filed in bad faith.

4. Accordingly, the instant case has not been filed in bad faith, and there is no presumption of bad faith.

5. Furthermore, that I have had a significant and substantial change of financial circumstances since the original filing and thus forms the basis for the requested relief, which revolves around new employment with increased wage employment income, and along with a substantial reduction in overall monthly living expenses, and thus resulting in overall increased net disposable income, since the filed case.

WHEREFORE, I, Linda T. Giaccio, Pro Se Chapter 13 Debtor, respectfully request a court order granting the requested relief, and thereby authorizing an extension of the bankruptcy automatic stay beyond the initial thirty (30) day period, and requests that said stay remain in effect during the remaining pendency of the current pending Chapter 13 case, as presented by changed financial circumstances, in good faith, and in clear and convincing evidence to the contrary, and thereby rebutting the presumption that the subsequent bankruptcy case is filed in bad faith, and for any other and further relief that this Court deems just and appropriate.

Dated this 17<sup>th</sup> day of June, 2024.

  
Linda T. Giaccio, Pro-Se Debtor